1	Lance A. Maningo			
	MANINGO LAW			
2	Nevada Bar No. 6405			
3	400 South 4 th Street, Suite 650 Las Vegas, Nevada 89101			
4	702.626.4646			
	lance@maningolaw.com			
5	Attorney for Defendant			
6	UNITED STATES DISTRICT COURT			
7	DISTRICT OF NEVADA			
8	THE UNITED STATES OF AMERICA,)		
9)		
10	Plaintiff,)		
10) 2:19-cr-00071-RFB-BNW		
11	vs.) (First Request)		
12	STYLES'ZA WASHINGTON,)		
12)		
13	Defendant.)		
14	Defendant.)		
15				

STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT AND CONTINUE SENTENCHING

Certification: This Stipulation and Order is being timely filed

IT IS HEREBY STIPULATED by and between Christopher Chiou, Acting United States Attorney and, SHAHEEN TORGOLEY, Assistant United States Attorney, Counsel for the United States of America and, LANCE A. MANINGO, of Maningo Law, counsel for Defendant STYLES'ZA WASHINGTON, that the deadline for Defendant's objections to the Presentence Investigation Report presently due May 12, 2021 be extended thirty (30) days, and the sentencing currently set on June 8, 2021 be vacated and continued thirty (30) days or to a date and time convenient to this Honorable Court.

This Stipulation is entered into for the following reasons:

1. That counsel received the Presentence Investigation Report on April 28, 2021;

1	2.	2. That WASHINGTON's objections to the Presentence Investigation Report are due on May 12, 2021;			
3	3.	3. That WASHINGTON contacted undersigned counsel on May 11, 2021, to discuss objections to the PSR;			
5	4.	That counsel needs additional time Investigation Report as well as prepa	to prepare objections to the Presentence are for sentencing;		
6	5.	That the AUSA Shaheen Torgoley is	s agreeable to the continuance;		
7 8	6.	That WASHINGTON, who is out continuance;	of custody, has no objection to the		
9	7.	That denial of this request for co STYLES'ZA WASHINGTON, suff	nuance would deny the Defendant,		
11		make objections to his Presenten	ace Investigation Report, if any, and taking into account the exercise of due		
12		diligence; and			
13	8.	<u> </u>	tinuance could result in a miscarriage		
14		of justice.			
15	RESPECTFULLY SUBMITTED this 11 th day of May, 2021.				
16					
17	CHRISTOPH	ER CHIOU	MANINGO LAW		
18	United States By: /s/ Shah	-	By: <u>/s/ Lance Maningo</u> LANCE MANINGO, ESQ.		
19	SHAHEEN T	ORGOLEY	Counsel for Defendant WASHINGTON		
20	Assistant United States Attorney Counsel for Plaintiff				
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5	Attorney for Defendant					
	UNITED STATES DISTRICT COURT					
6	DISTRICT OF NEVADA					
7						
8	THE UNITED STATES OF AMERICA,					
9	Plaintiff,)					
10	vs.)	2:19-cr-00071-RFB-BNW (First Request)				
11)					
12	STYLES'ZA WASHINGTON,)					
13	Defendant.					
)					
14	FINDINGS OF FAC	T				
15	FINDINGS OF FAC	<u>, 1</u>				
16	Based upon the pending Stipulation of the parties	s, and good cause therefore, the				

e Court

finds that:

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- 1. That counsel received the Presentence Investigation Report on April 28, 2021;
- 2. That WASHINGTON's objections to the Presentence Investigation Report are due on May 12, 2021;
- 3. That WASHINGTON contacted undersigned counsel on May 11, 2021, to discuss objections to the PSR;
- 4. That counsel needs additional time to prepare objections to the Presentence Investigation Report as well as prepare for sentencing;
- 5. That the AUSA Shaheen Torgoley is agreeable to the continuance;
- 6. That WASHINGTON, who is out of custody, has no objection to the continuance;
- 7. That denial of this request for continuance would deny the Defendant, STYLES'ZA WASHINGTON, sufficient time within which to effectively

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	diligence; and
2 3	8. That denial of this request for a continuance could result in a miscarriage of justice.
4	61 Justice.
5	CONCLUSIONS OF LAW
6	The ends of justice served by granting said continuance outweigh the best interests
7	
8	of the public and the defendant, since the failure to grant said continuance would be likely to
9	result in a miscarriage of justice.
10	<u>ORDER</u>
11	IT IS THEREFORE ORDERED that the deadline to file objections to the Presentence
12	Investigation Report, previously set for May 12, 2021 is elapsed and continued to
13 14	June 14, 2021 ;
15	IT IS FURTHER ORDERED that the that sentencing in this matter currently scheduled
16	for June 8, 2021 at 11:00 a.m. be vacated and continued to July 8, 2021 at
17	1:00 PM in LV Courtroom 7C.
18	DATED this <u>14th</u> day of May, 2021.
19	$ \mathcal{A} $
20	
21	RICHARD F. BOULWARE, II
22	UNITED STATES DISTRICT JUDGE Respectfully submitted by:
23	
24	/s/ Lance Maningo LANCE A. MANINGO, ESQ.
25	Nevada Bar No.: 006405
26	400 S. 4 th Street, Suite 650 Las Vegas, Nevada 89101
,	Attorney for Defendant

make objections to his Presentence Investigation Report, if any, and thoroughly prepare for sentencing, taking into account the exercise of due